



Entered on Docket  
January 28, 2011

*Bruce A. Markell*

Hon. Bruce A. Markell  
United States Bankruptcy Judge

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Attorney for Manny G. Gomez, P.E.

**UNITED STATES BANKRUPTCY COURT**  
**DISTRICT OF NEVADA**

In re:

SOUTH EDGE, LLC, a Nevada Limited  
Liability Company

Alleged Debtor.

Case No. 10-32968 (BAM)

Chapter 11 (Involuntary)

**ORDER GRANTING MOTION FOR  
PROTECTIVE ORDER AS TO MANNY  
G. GOMEZ, P.E.**

The Motion of Manny G. Gomez, P.E. ("Gomez") pursuant to Fed. R. Civ. P. 45(c)(1), requesting a protective order to compensate Gomez for the burden or expense incurred related to his compliance with the subpoena served on behalf of JPMorgan Chase Bank N.A. ("JPMorgan") [DE 331], said motion having been properly served and JPMorgan having filed its Notice of No Objection [DE 346], and good cause appearing, the Court makes its Order as follows:

ORDERED:

The Motion is Granted; and

JPMorgan, as the party who served a subpoena upon Gomez, is directed to compensate Gomez for the burden or expense incurred related to his compliance with the subpoena.

###

1 Prepared and Submitted By:

2 /s/ Andrew J. Urban Jr.

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**DECLARATION OF ANDREW J. URBAN JR. ESQ. FOR APPROVAL PURSUANT TO  
LOCAL RULE 9021(D)**

I, Andrew J. Urban Jr. Esq., declare pursuant to 28 U.S.C. § 1746, as follows:

1. I submit this Declaration in support of the proposed Protective Order requested by Movant, Manny G. Gomez, P.E. in his Motion for Protective Order [DE 331] filed on January 22, 2011 for relief from the burden and expense of his compliance with the subpoena issued by JP Morgan Chase Bank, N.A. for his appearance and testimony at the hearing set for 9:30 AM on February 2, 2011.

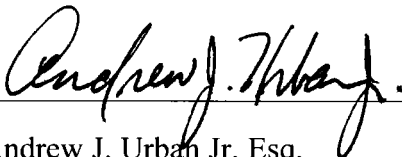
2. A hearing on the Motion is not necessary as I discussed the proposed motion and relief Movant would be requesting under Fed. R. Civ. P. 45(c)(1) with counsel for JP Morgan Chase Bank, N.A. and the parties agreed that JP Morgan Chase Bank was not opposed to the relief Movant was seeking. Further, no other parties to this case are impacted by the relief sought in the Motion for Protective Order other than the party issuing the subpoena, JP Morgan Chase Bank, N.A. and the Movant, Manny G. Gomez, P.E.

3. Notice of the Motion was served by Notice of Electronic Filing by the ECF System on January 22, 2011, see Exhibit A attached. I also served a copy of the Motion by direct email as opposed to through the ECF System to the persons listed on Exhibit B attached. As evidenced by the Certificate of Service filed January 22, 2011 [DE 339].

4. I have not received any objections to the motion nor do I know of any objections to the requested relief as of the date this proposed order was submitted.

5. Further, on January 23, 2011, JP Morgan Chase Bank, N.A. filed its Notice of No Objection to the Motion for Protective Order [DE 346].

I declare under penalty of perjury that the foregoing is true and correct. Executed this 27<sup>th</sup> day of January, 2011 at Henderson, Nevada.



Andrew J. Urban Jr. Esq.

# EXHIBIT A

**From:** USBC\_NEVADA@nvb.uscourts.gov <USBC\_NEVADA@nvb.uscourts.gov>  
**Subject:** 10-32968-bam Motion for Protective Order  
**Date:** Sat, 22 Jan 2011 15:26:32 -0800  
**To:** <Courtmail@nvb.uscourts.gov>  
**CC:**  
**BCC:**

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**U.S. Bankruptcy Court  
District of Nevada**

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The following transaction was received from ANDREW J URBAN entered on 1/22/2011 at 3:26 PM PST and filed on 1/22/2011

**Case Name:** SOUTH EDGE, LLC  
**Case Number:** 10-32968-bam  
**Document Number:** 331

**Docket Text:**

Motion for Protective Order Filed by ANDREW J URBAN JR on behalf of Manny G. Gomez (URBAN, ANDREW)

The following document(s) are associated with this transaction:

**Document description:**Main Document

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[STAMP bkecfStamp\_ID=989277954 [Date=1/22/2011] [FileNumber=18383337-0]  
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619b21984ff1dd3dc2aa6b6ee652f8a451fef80345a616d56b64b5ccd684]]

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# EXHIBIT B

Mailing list for Motion for Protective Order  
**Manny G. Gomez Motion for Protective Order (#331)**  
 January 22, 2011

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**Manny G. Gomez Motion for Protective Order (#331)**

January 22, 2011

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